

# EXHIBIT 8

## John Bogdanov

---

**From:** Lauren Russell <LaurenRussell@tatp.com>  
**Sent:** Monday, March 12, 2012 11:05 AM  
**To:** John Bogdanov  
**Subject:** RE: CRT/Philips Finished Product Custodians

Hey John, I'm really sorry for the delay. I'll call you in a few if you're still free. Thanks.

---

**From:** John Bogdanov [mailto:jdb@coopkirk.com]  
**Sent:** Monday, March 12, 2012 8:55 AM  
**To:** Lauren Russell  
**Cc:** malioto@tatp.com  
**Subject:** RE: CRT/Philips Finished Product Custodians

That works for me; we will talk then.

---

**From:** Lauren Russell [mailto:LaurenRussell@tatp.com]  
**Sent:** Sunday, March 11, 2012 5:35 PM  
**To:** John Bogdanov  
**Cc:** malioto@tatp.com  
**Subject:** RE: CRT/Philips Finished Product Custodians

Can we do 10.30? I will call you. Thanks.

---

**From:** John Bogdanov [mailto:jdb@coopkirk.com]  
**Sent:** Friday, March 09, 2012 5:19 PM  
**To:** Lauren Russell  
**Cc:** malioto@tatp.com  
**Subject:** RE: CRT/Philips Finished Product Custodians

Lauren,

I believe the last word (other than the letter we just sent to them) is the attached 8-11-11 email exchange with Andreas regarding finished product custodians. At that point we had agreed on the [REDACTED]

I can chat Monday. How about 11?

John D. Bogdanov  
COOPER & KIRKHAM, P.C.  
357 Tehama Street, Second Floor  
San Francisco, CA 94103  
Telephone: 415-788-3030, Ext. 307  
Facsimile: 415-882-7040  
email: [jdb@coopkirk.com](mailto:jdb@coopkirk.com)

The information in this e-mail is confidential and may contain attorney-client privileged information and/or attorney work product and is intended solely for the addressee(s). Access to this email by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution, or any use or reliance on any information contained herein is strictly prohibited. If you have received this message in error, please notify the sender immediately and delete it.

---

**From:** Lauren Russell [<mailto:LaurenRussell@tatp.com>]  
**Sent:** Thursday, March 08, 2012 7:56 PM  
**To:** John Bogdanov  
**Cc:** [malioto@tatp.com](mailto:malioto@tatp.com)  
**Subject:** RE: CRT/Philips Finished Product Custodians

Thanks, John. I thought that when I read his email but hadn't yet checked. [REDACTED]  
[REDACTED]

I went back and reviewed the correspondence re additional custodians (his June 2011 letter, our July 11, 2011 letter, and his July 27, 2011 email) and I'm not sure that we ever agreed to the [REDACTED]. I can only find a draft response to his July 27 email, which doesn't mention the [REDACTED]. Do you have a copy of the response? I think Aaron or Rick may have sent it in early/mid-August 2011.

Let's chat on Monday and decide where to go from here. thanks.

Lauren

---

**From:** John Bogdanov [<mailto:jdb@coopkirk.com>]  
**Sent:** Wednesday, February 29, 2012 4:04 PM  
**To:** Lauren Russell  
**Cc:** [malioto@tatp.com](mailto:malioto@tatp.com)  
**Subject:** FW: CRT/Philips Finished Product Custodians

Lauren -

Regarding Andreas' last paragraph, as you know, we did indeed include [REDACTED] in the list of finished product custodians, and nothing in our letter indicates otherwise. At page 4 of the letter, we said that [REDACTED]  
[REDACTED] Then continuing on page 5, we stated [REDACTED]  
[REDACTED]

John

---

**From:** [andreas.stargard@bakerbotts.com](mailto:andreas.stargard@bakerbotts.com) [<mailto:andreas.stargard@bakerbotts.com>]  
**Sent:** Wednesday, February 29, 2012 2:54 PM  
**To:** [LaurenRussell@tatp.com](mailto:LaurenRussell@tatp.com)  
**Cc:** [malioto@tatp.com](mailto:malioto@tatp.com); John Bogdanov; [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com); [joseph.ostoyich@bakerbotts.com](mailto:joseph.ostoyich@bakerbotts.com)  
**Subject:** RE: CRT/Philips Finished Product Custodians

Dear Lauren:

Per our mutual agreement on discovery limitations reached in June of 2011 to produce responsive records from 19 Philips custodians, with the option of plaintiffs adding, "for good cause shown ... **up to five custodians**" (see my letter dated June 17, 2011), we have undertaken "reasonable efforts to locate such custodial records and inform you of the results." (*Id.* at page 3).

Based on our analysis of the availability of records from the individuals you identified in your e-mail, it appears that files exist for, coincidentally, five individuals, namely Messrs. Coenraad, Costello, Neilson, Power, and Pechon, but not for Messrs. Haring or Tilanus. Let me be clear: We have not yet obtained, much less reviewed, any of their actual records. We are only confirming that there are some records. This e-mail should not be construed as an indication that these individuals' records contain relevant information. I can only confirm, at this stage, that we were able to locate some files for them.

While Philips' objections to the vast scope of your sought finished-products discovery stand, we will add these five individuals as custodians for purposes of providing plaintiffs with the limited discovery that is permissible under the Court's finished-products orders from the summer of 2011. We will review their files for responsive, non-privileged documents and are offering to produce those files to you, in return for plaintiffs' promised withdrawal of their pending 30(b)(6) notices to Philips.

Lastly, I note that we have twice offered Messrs. Selbeck and Mintz as likely relevant custodians with available records (once in the fall of 2011 and again this month), yet you have chosen not to take us up on this offer in your letter dated today, which I just received as a PDF attachment.

Regards,  
Andreas.

---

**From:** Lauren Russell [<mailto:LaurenRussell@tntp.com>]  
**Sent:** Thursday, February 23, 2012 01:23  
**To:** Stargard, Andreas  
**Cc:** [malioto@tntp.com](mailto:malioto@tntp.com); 'John Bogdanov'  
**Subject:** CRT/Philips Finished Product Custodians

Hi Andreas,

As discussed this afternoon, here is our list of possible custodians from Philips' finished product business:

1. **Robert Coenraad** - Juarez Operations -- PENAC BMT
2. **Tom Costello** - Sales Development, Senior VP Retail Sales, Senior VP Global Accounts of PENAC (in charge of Best Buy, Wal-Mart, Costco, Circuit City)
3. **C. Haring** – Philips Consumer Electronics Worldwide, Regional Purchasing Manager, North America
4. **John Neilson** - GM Monitors; VP Business Display Solutions & Monitors -- PENAC
5. **Des Power** - Senior VP Marketing & Sales Premier -- PENAC BMT, also shown as “D. Power – Television”
6. **Bob Pechon** – Sr. VP, National Retail Sales, PENAC
7. **D. Tilanus** – Philips Consumer Electronics Worldwide, Purchasing Manager

We have selected these names from over 100 potentially relevant employees in the org charts, and have further reduced the numbers since we spoke yesterday in order to facilitate our negotiations. I'll look forward to hearing from you on or before February 29.

Best,

Lauren

Lauren C. Russell  
Attorney at Law  
Trump, Alioto, Trump & Prescott, LLP  
2280 Union Street  
San Francisco, CA 94123

Telephone: (415) 563-7200

Facsimile: (415) 346-0679

E-mail: [lauren russell@tatp.com](mailto:lauren russell@tatp.com)

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by e-mail and delete the message and any attachments.

**Confidentiality Notice:** The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.